DIANE JOY GOODMAN 2841 Sacramento Street #306 San Francisco, CA 94115

Comment to the National Organic Standards Board State College, PA

April 20, 2006

I would like to offer a clarification to my comment yesterday and that while my comment yesterday reflected the comment of Florida Crystals, today I would like my comment to reflect on the Florida Crystals comment

My previous comment referred to a disagreement with the suggestion that a Substance be defined as a compound or element that has a distinct identity such as a separate CAS number.

In the context of defining a synthetic as a substance that is created by chemical change that produces a separate and entirely new substance, that all synthetics may be distinct compounds or elements, but all compounds or elements may not be synthetic simply because they are created by chemical change.